## **REMARKS**

## STATUS OF THE CLAIMS

Claims 1 and 3-9 are pending in the application.

Claims 1, 3-5, 7 and 9 are rejected under 35 U.S.C. 102(e) as anticipated by Grun (US Patent Publication 2004/0107304).

Claims 6 and 8 are rejected under 35 USC 103(a) as being unpatentable over Grun in view of Official Notice.

According to the foregoing, the claims are amended, and, thus, the pending claims remain for reconsideration, which is respectfully requested.

No new matter has been added.

## **REJECTIONS**

The Office Action page 2, item 4 rejects claims 1, 3-5, 7 and 9 under 35 U.S.C. 102(e) as anticipated by Grun (US Patent Publication 2004/0107304).

The Office Action relies upon Grun FIG. 2 and paragraphs 42, 43, 44, 50, 55, and 57. However, Grun only discusses interfacing an I/O controller 24 to a channel-based switched fabric 16 via a target service interface (TSI) 26. See for example, Grun paragraphs 26 and 42, last three lines. Grun paragraph 43 discusses "The target service interface [(TSI)] 26 defines primitives or commands that allow communication of messages and data between I/O controllers [24 in an I/O unit 14] and initiators [20] in the host." Thus, in Grun, a host initiator 20 can request for I/O services from the I/O controllers 24 of an I/O unit 14 by using the target service interface (TSI) 26 which defines an interface in the I/O unit 14 between a target channel adapter 22 and I/O controllers 24. Referring to FIG. 1 of the present Application, Grun is directed defining a target service interface (TSI) 26 between the claimed client-side device handler 26 and client-side I/O port 25 to allow for the client side I/O port 25 to access message and data services provided by a purported client-side channel adapter of a channel-based switched fabric 16 (see Grun paragraphs 46 and 55). Thus, Grun paragraphs 43-44 discusses an initiator 20 at the host side 12 generates requests for I/O services from an I/O unit 14, and a target service interface (TSI 26) at the I/O unit 14 defines how messages and data are transferred between an I/O

controller 24 in the I/O unit 14 and the host initiator 20. The host initiator 20 uses the host channel adapter 18 to communicate with the I/O unit 14 across the channel-based switched fabric 16.

According to the forgoing, the independent claims are amended to emphasize patentably distinguishing features. In contrast to Grun, the claims provide a benefit of allowing a client-side I/O controller (e.g., O-POS) 6 and client side device driver 17 to reside on a server side rather than on the client side to reduce client-side processing, which is achieved by providing the claimed "client-side software at the server ... a client-side device driver to function at the server" and "a virtual I/O port to function at the server to provide the client-side device driver at the server with an interface having same function as an I/O port at the client as the client-side I/O port for the client-side device driver at the server as a client-side I/O port interface to the device driver by transmitting an input-output control received from the client-side device driver at the server of an event received client-side from the I/O device event connected to the client" and "a client-side device handler to receive the input-output control from the virtual I/O port in the server and to transmit the client-side I/O device event, from the I/O device connected to the client, to the server-virtual I/O port in the server."

In other words, Grun FIG. 2 discusses a channel-based switched fabric 16 between a host 12 and an I/O unit 14, with a host channel adapter 18 in the host 12 and a target channel adapter 22 in the I/O unit 14, but Grun's host channel adapter 18 differs from the claimed embodiment to anticipate the claimed "a virtual I/O port to function at the server to provide the client-side device driver at the server with an interface having same function as an I/O port at the client as the client-side I/O port for the client-side device driver at the server," because Grun is silent on, and fails to disclose, either expressly or inherently (by necessarily including), that the host channel adapter 18 functions as a virtual I/O port for an I/O port on the I/O unit 14. Further, Grun cannot anticipate the claimed embodiment by failing to disclose, either expressly or inherently, the claimed "client-side software at the server ... a client-side device driver to function at the server," because in Grun the initiators 20 are not expressly or inherently (necessarily) client-side software executing at the server rather than on the client. The claimed "a virtual I/O port to function at the server" provides the client-side device driver 17 and/or the I/O requester(s) 6, 10 with an interface having same function as an I/O port 25 on the

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client.

In view of the claim amendments and remarks, withdrawal of the rejection of pending claims and allowance of pending claims is respectfully requested.

## **CONCLUSION**

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

Respectfully submitted, STAAS & HALSEY LLP

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